

IN THE UNITED STATES DISTRICT  
COURT FOR THE EASTERN DISTRICT  
OF PENNSYLVANIA

Eric Kashkashian

v.

Civil Action No.

16-CV-3755

Christina A. King

Doctor John Markley, Doctor Abbey Cassidy,  
Patricia Snyder, Josh Buchanan,  
Christina C. Cregar, Blake Jackman.

AMENDED COMPLAINT

I. JURISDICTION & VENUE

1. This is a civil action authorized by 42 U.S.C. Section 1983 to redress the deprivation, under color of state law, of rights secured by the Constitution of the United States. The court has jurisdiction under 28 U.S.C. Section 1331 and 1343(a)(3). Plaintiff seeks declaratory relief pursuant to 28 U.S.C. Section 2201 and 2202. Plaintiff's claims for injunctive relief are authorized by 28 U.S.C. Section 2283 & 2284 and Rule 65 of the Federal Rules of Civil Procedure.

2. The United States district court for the eastern district of Pennsylvania is an appropriate venue under 28 U.S.C. section 1391(b)(2) because it is where the events giving rise to this claim occurred.

## II. PLAINTIFF

3. Plaintiff, Eric Kashkashian, is and was at all times mentioned herein a prisoner of the State of Pennsylvania in the custody of the Pennsylvania Department of Corrections. He is currently confined in Bucks County Corrections, in Doylestown Pennsylvania.

## III. DEFENDANTS

5. Defendant, Christina A. King is head of the office for the public defenders. She is legally responsible for overseeing, all the operation of the public defenders office, who works for the County of Bucks.

64. Defendant, doctor John Markay, wrongfully and to his deliberate indifference, in gathering and releasing, the plaintiffs, protected medical hippa rights has wrongfully been copied and pasted, being used again wrongfully, in a new psychological evaluation, done by an intern, defendant Patricia Snyder, who did not disclose, shes not a medical doctor. The new evaluation was then co-signed by defendant doctor Abbey Cassidy, and another wrongful transfer to Norristown State Hospital is likely to happen again, due to the prisons negligence, violated plaintiff Eric Kashkashian's rights and consitituted liberty, under the Fourteenth Amendment to the United States Constitution.

74. A preliminary and permanent injunction ordering defendants, <sup>Christina A. King</sup> Doctor John Markes, Doctor Abbey Cassidy, Patricia Snyder, Josh Buchanan, Christina C. Cregar, Blake Jackson, to, withdrawal of wrongfully gathered information, dated, reason, fault, withdrawal of evaluation done on 8/16/2016 by, Patricia Snyder, withdrawal of transferring plaintiff to Norristown State Hospital, A letter written from all wrongful parties in form of an apology, letter written to judge of said court where evaluation was heard an apology and wrongdoing.

75. Compensatory damages in the amount of \$500,000.00 against each defendant, jointly and severally

76. Punitive damages in the amount of 1,000,000.00 against each defendant.

77. A jury trial on all issues triable by jury.

78. Plaintiff's costs in this suit.

79. Any additional relief this court deems just, proper, and equitable.

1/18/2017

Respectfully Submitted

  
Eric Kashkashian